

M/035/012

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DIVISION OF
OIL, GAS AND MINING

August 10, 2000

Mr. D. Wayne Hedberg
Permit Supervisor
Minerals Regulatory Program
Division of Oil, Gas, and Mining
1594 West North Temple, Suite 1210
Salt Lake City, Utah 84114-5801

Re: Reply to Initial Review of Revised Large Mining Operations Notice, Harper Contracting,
Parleys Canyon Rock Quarry, M/035/012, Salt Lake County, Utah

Dear Mr. Hedberg:

Below are listed, by your reference numbers, the response to each of the comments you listed in your July 11, 2000 letter.

R647-4-105 - Maps, Drawings & Photographs

105.1 Topographic base map, boundaries, pre-act disturbance

The previous Operations section of the NOI has been changed to read 64.0 acres, the correct area, to coincide with the 64.0 acres shown on Plate 1.

105.2 Surface facilities map

The alternate upper primary crusher station is the location where the existing primary crusher station will be relocated to at some point during future mining operations. The same equipment will be located first at the lower site, and later at the upper site. The surety calculations include only one crusher facility because only one crusher will be on site at any one time.

Plate 4 Rehabilitation Map, and Plate 2 Existing Conditions have been changed to reflect the additional disturbance of 1.2 acres on the west side of the project area. The remaining 2.3 acres of the 3.5 acres referenced in the Division's review comments (located at the eastern edge of the project area) remain in essentially the same condition as they were prior to the January 13, 1998 amendment and has not been disturbed by Harper's activities. Therefore, this disturbance has not been included in the disturbed area covered by the current revision notice.

105.3 Drawings or Cross Sections (slopes, roads, pads, etc.)

Cross Sections are provided on a new drawing numbered Plate 6.

R647-4-107 - Operation Practices

107.1.15 Constructing berms, fences, etc. above highwalls

As discussed in Section 9.1 and 9.3, protection of public safety in the vicinity of the reclaimed pits will be provided by gates, signs, and safety berms. Fencing is not proposed in the proposed revision, nor was it proposed in the previously approved NOI's. As stated in Section 9.3, safety berms are proposed to be located at the end of each bench and for reasons of clarity have not been shown on the Rehabilitation Map Plate 4. Warning signs will be installed at each gate and Sections 7.0 and 9.1 have been modified to reflect the proposed sign locations.

107.2 Drainages to minimize damage

Section 6.1.1 has been modified to address this comment.

R647-4-109 - Impact Assessment

109.1 Impacts to surface & groundwater systems

Refer to comment under 107.2

R647-4-110 - Reclamation Plan

110.2 Roads, highwalls, slopes, drainages, pits, etc., reclaimed

Section 7 has been modified to address this comment.

R647-4-111 - Reclamation Practices

111.1 Public safety & welfare

1.15 Constructing berms/fences above highwalls

Refer to reply under 107.1.15.

R647-4-112 - Variance

Not applicable - No variances were requested

R647-4-113 - Surety

The current calculations which resulted in lower unit rates for ripping roads, pit floors, and benches utilized the current Caterpillar Performance Handbook for both productivity and costs. We feel that this is reasonable for the existing situation.

See our comment under the 105.2 above.

Section 9.4, Roads and Operation Areas - ripping has been changed from 28.9 acres to 44.2 acres to coincide with Section 9.6, Revegetation. Also in Section 9.6 the total acres to be revegetated has been changed to 44.2 acres (the correct summation). All applicable surety calculations have been corrected to account for these changes.


The present escalation used by the Division of 3.27% has been integrated into the Surety calculations and can be seen in paragraphs 9.11 and 9.12

R647-4-115 - Confidential Information

Not applicable - No confidential information is included in this Notice.

If there are any further questions or concerns, please feel free to contact us as Harper would like to receive approval for this amendment, as soon as possible.

Sincerely,


William W. Fuller PE

Mining/Environmental Engineer

cc. Lawnie Mayhew, Harper
 Bob Bayer, JBR

attachment